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 Infinity Health Solutions, LLC*

**UNITED STATES BANKRUPTCY COURT
 DISTRICT OF NEVADA**

In re:
 INFINITY CAPITAL MANAGEMENT, INC.
 Debtor.

HASELECT-MEDICAL RECEIVABLES
 LITIGATION FINANCE FUND
 INTERNATIONAL SP,

Plaintiff,

v.

ANNE PANTELAS; OLIVER HEMMERS; and
 INFINITY HEALTH SOLUTIONS, LLC,

Defendants.

Case No. BK-21-14486-ABL

Chapter 7

Adversary Case No. 22-01109-ABL

**DECLARATION OF OGONNA
 BROWN IN SUPPORT OF MOTION
 TO WITHDRAW AS COUNSEL FOR
 DEFENDANTS ANNE PANTELAS,
 OLIVER HEMMERS AND INFINITY
 HEALTH SOLUTIONS, LLC**

Hearing Date: TBD

Hearing Time: TBD

REMOTE

Court Hearing Participation Number
 (888) 684-8852

Code #8242009

Judge: Hon. August B. Landis

I, Ogonna Brown, declare and state as follows:

1. I am over the age of 18 and mentally competent. Except where stated on information and belief, I have personal knowledge of the facts in this matter, and, if called upon to testify, could and would do so.

2. I am an attorney duly licensed to practice law in the State of Nevada. I am a partner attorney with the law firm Lewis Roca Rothgerber Christie (the “Firm”).

3. I make this Declaration in support of the *Motion to Withdraw as Counsel for Defendants Anne Pantelas, Oliver Hemmers and Infinity Health Solutions, LLC* (“Motion”).

4. The Firm has been counsel of record for Defendants Anne Pantelas, Oliver Hemmers and Infinity Health Solutions, LLC (the “Defendants”) in this Case¹ since approximately January 21, 2022.

5. The Defendants have been given reasonable warning that the Firm will withdraw.

6. The Defendants have expressed to me a desire to proceed without representation by the Firm.

7. The Firm has provided ample opportunity, in the form of passage of time and also multiple discussions, to fulfill obligations.

8. Defendants are unable to pay the outstanding invoices due and owing to the Firm, such that continued representation will result in an unreasonable financial burden imposed upon the Firm.

9. There are no pending motions or imminent hearings or deadlines pending in the Case that are applicable to the Defendants, as no discovery is pending and no upcoming hearing is pending before this Motion will be heard, as the Firm will attend the Scheduling Conference hearing set for September 12, 2023. *See* Order Granting Stipulation to Extend Deadlines and Trial (ECF No. 32); *see also* Brown Decl. The deadlines set forth in the Order approving the Stipulation extending the deadlines in this case (ECF No. 32) are as follows:

Event Deadline	Proposed Date
Close of Fact Discovery	10/2/2023
Expert Disclosure Deadline	10/2/2023
Rebuttal Expert Deadline	11/2/2023

¹ All references to “ECF No.” are to the numbers assigned to the documents filed in the bankruptcy case identified in the caption above (“Case”) as they appear on the docket (“Docket”) maintained by the Clerk of the Court of the United States Bankruptcy Court for the District of Nevada.

Expert Deposition Deadline	12/1/2023
Dispositive Motion Deadline	12/22/2023
Final List of Witnesses and Exhibits	1/15/2024
Expected Trial Ready Date	2/15/2024

10. There has been no formal trial date set via scheduling order or other order from this Court in the above-captioned adversary complaint (ECF No. 32).

11. The last known address, email addresses and contact information for Defendants are follows:

Anne Pantelas

Oliver Hemmers

Infinity Health Solutions LLC

Address: 1550 W. Horizon Ridge Parkway
Suite R#140
Henderson, NV 89012

Emails: oliver@infinityhealth.solutions
anne@infinityhealth.solutions

Tel.: (702) 525-8767

I declare under penalty of perjury that the foregoing is true and correct.

DATED this 11th day of September, 2023.

LEWIS ROCA ROTHGERBER CHRISTIE LLP

By: /s/ Ogonna Brown
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*Attorneys for Anne Pantelas, Oliver Hemmers, and
Infinity Health Solutions, LLC*

CERTIFICATE OF SERVICE

I hereby certify that I am an employee of Lewis Roca Rothgerber Christie LLP, and that on the 11th day of September, 2023, I caused to be served a true and correct copy of **DECLARATION OF OGONNA BROWN IN SUPPORT OF MOTION TO WITHDRAW AS COUNSEL FOR DEFENDANTS ANNE PANTELAS, OLIVER HEMMERS AND INFINITY HEALTH SOLUTIONS, LLC**, in the following manner:

☒ (ELECTRONIC SERVICE) Under Administrative Order 02-1 (Rev. 8-31-04) of the United States Bankruptcy Court for the District of Nevada, the above-referenced document was electronically filed on the date hereof and served through the Notice of Electronic Filing automatically generated by that Court's facilities.

☒ (UNITED STATES MAIL) By depositing a copy of the above-referenced document for mailing in the United States Mail, first class postage prepaid, at Las Vegas, Nevada, to the parties listed on the attached service list, at their last known mailing addresses, on the date above written.

Anne Pantelas
 Oliver Hemmers
 Infinity Health Solutions LLC
 1550 W. Horizon Ridge Parkway, Suite R#140
 Henderson, NV 89012

☒ (ELECTRONIC MAIL) By transmitting electronically to the following recipient and last known email address:

Anne Pantelas anne@infinityhealth.solutions
 Oliver Hemmers oliver@infinityhealth.solutions
 Infinity Health Solutions LLC

☐ (OVERNIGHT COURIER) By depositing a true and correct copy of the above referenced document for overnight delivery via Federal Express, at a collection facility maintained for such purpose, addressed to the parties on the attached service list, at their last known delivery address, on the date above written.

/s/ Renee L. Creswell

An employee of
 Lewis Roca Rothgerber Christie LLP